

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CRIMINAL NO. 3:23-CR-149</b>
	:	
<b>DAMIEN BOLAND,</b>	:	
<b>ALFRED ATSUS,</b>	:	
<b>JOSEPH ATSUS AND</b>	:	<b>JUDGE MANNION</b>
<b>NICHOLAS DOMBEK</b>	:	
	:	
<b>Defendants.</b>	:	<b>ELECTRONICALLY FILED</b>

**JOINT REQUEST FOR PRE-TRIAL DISCLOSURE OF NOTICE OF  
INTENT TO USE EVIDENCE PURSUANT TO FED. R. EVID. 609(b)(2)**

Defendants Damien Boland, Alfred Atsus, and Joseph Atsus, by and through their undersigned counsel, pursuant to Rule 609(b)(2) of the Federal Rules of Evidence, request from the Government pretrial written disclosure which arguably will be admissible under the provisions of Rule 609(a)(1) and or (2).

Pursuant to the instructions of the Court, Defendants have identified this Request as being of a common interest to them. Defendants have therefore filed this Request jointly, in an effort to narrow and focus the issues that are pending before the Court.

Respectfully submitted,

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Date: July 12, 2024

**CERTIFICATE OF SERVICE**

I, Patrick A. Casey, hereby certify that a true and correct copy of the foregoing Request for Pre-Trial Disclosure of Notice of Intent to Use Evidence Pursuant to Fed. R. Evid. 609(b)(2) was served upon the following counsel of record via the Court's ECF system on this 12<sup>th</sup> day of July 2024:

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